

EXHIBIT F

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF MICHAEL P. BRODBECK

I, Michael P. Brodbeck, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attacks of the occurred.

4. I was a firefighter with the New York Fire Department, Engine 210, Ladder 110 in Brooklyn. I was 30 years old and a 6-year veteran of the FDNY. I had just started a lucrative promotional business, was engaged and was studying for the lieutenant exam. My life could not have been any better.

Our company was dispatched to the towers in New York City at Ground Zero after the first plane hit the towers. We reported to the command post in the North Tower but had to

wait as numerous people jumped to their deaths in front of us. We entered the North Tower and our way up to the 31st Floor. As we were "popping doors" checking to make sure everyone was getting out, we felt like an earthquake hit the building. It was swaying to the right and left as much as 10 feet. I stood in the stairwell one foot from the wall under the header as I thought that was the safest spot. Lieutenant Wayne Mera then made the decision to evacuate. As we started down the stairwell, we came upon fleeing civilians. I helped a woman who was around 55 years old. She was having breathing and walking problems and I gave her my personal mask so she could breathe. As we exited the building, it was like walking into an Apocalypse movie – bodies everywhere.

About 2 minutes after exiting the North Tower, the building collapsed. I started running but the compression wave of dust and debris from the collapse hit me about 5 seconds later, sweeping me off my feet. I was thrown 10 feet into the side of a truck, breaking my arm and thumb. I got up and as I started running through the darkness of the dust and debris, I ran onto a median and fell 5 feet between a curb and a tire. I crushed my right shoulder, dislocating it as well and I could not breathe or use my arm. I found my way to a wall while the building still coming down around me. I found glass and tried to break it but realized I was actually banging on a door at the Verizon building. I was pulled inside by members of Engine Company 305 as they had taken refuge in the building.

In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen, something I never could have imagined I would ever see. What happened that day could only be compared to a war zone full of death and destruction. I was going about my everyday life when we were brutally attacked by the terrorists. I am no longer the same person I was that day. My life has been forever altered.

5. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I had a broken arm and thumb, a dislocated shoulder and torn right ACL. I also was diagnosed PTSD and continue to be treated for PTSD. I retired due to disability from PTSD in 2015. FDNY also diagnosed me with a blood abnormality in 2014.

6. As we were leaving for the towers, one of the guys who had gotten to the station earlier was riding in my position. He asked if he could stay in my position with the ladder company. His name was Kevin Reilly and I told him no because I generally stuck with the position I was supposed to ride. Little did I know that decision saved my life but sent him to his death. I think of Kevin every day. Survivor's guilt has been the hardest for me to deal with and his death particularly has haunted me for the last 18 years. People were exploding on impact with the ground and once we were in the building, there were people dead from the elevators crashing down. People were there with skin falling off because of burning jet fuel that had cascaded down the elevator shaft.

From that day forward, my life changed. Nothing would ever be the same. I dissolved my promotion business because I could not promote fun nightlife when I was attending funerals for my friends and fellow firefighters every day. I knew 104 of the 343 firefighters who died on 9-11. Despite the financial loss, I just could not do it anymore. The anger, the confusion and guilt I carried because I survived is something that no one can understand.

I married my fiancé a year after 9-11. We had two sons but my emotional trauma took its toll on our marriage and we divorced after 6 years. I lost so much time with my sons because of the divorce and it was devastating. I continued to work but outside of my job, my life began to disintegrate. I had problems reading and focusing and remembering things from my past. I studied for the Lieutenant's exam and passed but scored very low – missing questions about

things I knew as well as I knew my own name. I was sent to see Dr. Bhatt from the Counseling Services Unit in 2014. He told me that PTSD attacks the cognitive part of the brain. He explained that my brain is different now due to the trauma and my experiences on 9-11. I am numb on the outside, unable to process my feelings. I could not cry at my brother or father's funerals, which was upsetting to my family. I just couldn't explain that after living through a day like 9-11, I was numb to everything because nothing could be as bad as that day was. Those experiences robbed me of my emotional life. It cost me my marriage, time with my sons, my peace of mind and the lives of so many people I knew. I lost 50 friends in the towers, my best friend from my childhood and 104 guys I worked with from the FDNY.

7. I sought medical attention for my injuries on 9-11 and was treated for PTSD. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 0079493) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 1 day of JANUARY 2020.



Signature of Declarant – Michael P. Brodbeck

Exhibits Filed Under Seal